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February 7, 2012

Charles R. Coy, 1926-2010
Wm. Baxter Jennings, 1975-2004

The Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Petition for Declaratory Ruling, FCC No. 11-109

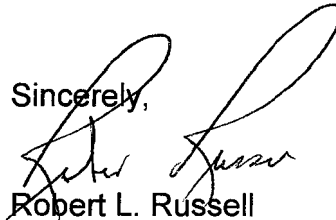
Dear Chairman Genachowski:

As a practicing lawyer in Richmond, Kentucky, I have written to the FCC and to the NTIA in the past to support the efforts of LightSquared, and I now write to support its position in its Petition for Declaratory Ruling, which is now pending.

In my 33 years of law practice, I have served in state government, including an appointment as Inspector General for the Commonwealth of Kentucky. Therefore, I understand the problems of operating a governmental agency in these times. I know, for example, that the FCC has a number of objectives for developing our economy through the best use of the airwaves. I know that it is deeply interested in providing universal cell phone and broadband service in rural areas of our country, such as the Eastern mountains of Kentucky. I also know that the FCC desires to foster competition in the marketplace and to utilize all of our available spectrum. With the increasing complexity of electronic devices we simply can't afford to waste portions of our spectrum. LightSquared is the only private company I know of which is in a position to quickly meet each of these objectives without government money.

LightSquared will be entirely privately funded, and will use no government or taxpayer money whatsoever. I am also impressed by the fact that LightSquared plans to invest \$14 billion in infrastructure for the project. The only issue I know of concerns the fears of the GPS manufacturers that LightSquared's signals will interfere with their equipment. As a former government watchdog myself, I am impressed by the fact that LightSquared has followed all of the procedural rules that have been put in place. However, the GPS manufacturers have designed equipment which looks into LightSquared's spectrum, even though the manufacturers have been on notice since at least 2001 that LightSquared was developing its system with the approval of the FCC.

Sincerely,



Robert L. Russell